

MOHRMAN, KAARDAL & ERICKSON, P.A.

ATTORNEYS AND COUNSELORS AT LAW

150 SOUTH FIFTH STREET
SUITE 3100
MINNEAPOLIS, MINNESOTA 55402

WILLIAM F. MOHRMAN

TELEPHONE: 612/341-1074
FACSIMILE: 612/341-1076
WRITER'S E-MAIL: MOHRMAN@MKLAW.COM

October 20, 2023

Via ECF

October 20, 2023

Honorable Dulce J. Foster
United States District Court, District of Minnesota
300 South Fourth Street
Minneapolis, MN 55415

Re: *Code v. Chauvin, et al.*
Case Number: 22-cv-01438 (PJS/DJF)

Dear Magistrate Judge Foster:

On behalf of all parties, I write in response to the Court's September 27 Order (Dkt. 34) requiring a status update in the above-referenced matter. Based on representations made to me by the other counsel in this matter, the matter has been fully settled. The signatories to the settlement agreement are the Plaintiff Ms. Code and Defendant the City of Minneapolis. As counsel to Mr. Chauvin, I was not involved in the negotiation or signing of this agreement.

Although Ms. Code executed the settlement agreement in April and returned it to the City at that time, there was a delay in receiving the countersigned agreement from the City, and as counsel to Mr. Chauvin, I did not receive a fully executed copy of the settlement agreement until Tuesday of this week. I had previously sent to Mr. Chauvin a partially executed settlement agreement (unexecuted by the City of Minneapolis). Because the settlement agreement purports to cover Mr. Chauvin based on the City of Minneapolis' signed agreement, I attempted to set up a phone call with Mr. Chauvin through the federal correctional institution but was informed that the phone call would have to be next week as a result of administrative issues at the facility unrelated to Mr. Chauvin. Assuming Mr. Chauvin approves the settlement agreement and grants me authorization to sign the stipulation of dismissal, the parties will file the stipulation and proposed order for dismissal with the Court. It is my understanding that all other parties have approved the stipulation.

The Honorable Dulce J. Foster

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Thank you for your attention to this matter.

Sincerely,

/s/ William F. Mohrman

William F. Mohrman

cc: All counsel of record (via ECF)